REMARKS

This Amendment, filed in response to the Office Action mailed June 10, 2009, is believed to fully address all issues raised in the Action. Favorable reconsideration of the application is respectfully requested.

I.   **Claims Disposition**

Claims 16-19, 21, 23 and 24 are all the claims pending in the application. Claims 16-18 are amended in order to more clearly set forth the claimed subject matter. No new matter is introduced.

II.   **Responses to Claim rejections under 35 U.S.C. § 103(a)**

A.   Rejections of Claims 16-18

In the Office Action, claims 16-18 are rejected under 35 U.S.C. 103 (a) as being unpatentable over Ronen (US 5,845,267) in view of Senez (US 7,200,551 B1) in further view of McNair (US 2001/0037297 Al). The detailed discussions of the rejection are provided on pages 2-8 of the Action, which are not repeated herein.

By this Amendment, Applicant has amended claims 16-18 to further distinguish the claimed invention from the teachings of the references. In particular, Applicant has defined the functions of the relay server and the management server in the claims in a rather detailed manner. Support for the claim amendment is found in FIGs. 7-9 and page 18, line 25-page 20 of the application.

Claim 16 is directed to a method for payment receipt and recites, *in part*, as follows (emphasis added):

> receiving processed payer information from a relay server, wherein the relay server <u>receives information on payers who have completed a payment process and payment amounts paid by the payers, transmitted from a financial institution server</u> and <u>selects information including personal details of the payers, paid amounts and paid dates, which a payee wants to obtain, among the received information</u> thereby to provide the processed payer information.

Amended claim 16 recites the step of "receiving processed payment information from a relay server" and "wherein the relay server <u>receives information</u>...transmitted <u>from a financial institution server</u>" and "selects <u>information including personal details of the payers, paid amounts and paid dates, which a payee wants to obtain,</u> among the received information thereby to provide the processed payer information." For example, referring to FIG. 7, the relay server (60) selects information among the information received from the financial institution server, i.e., <u>the information which the payee wants to obtain</u> as described at page 19, lines 5-9 of the application. It is clear that the amended features are supported by the application without introducing new matter.

Senez discloses a financial transaction system where a client receives a bill and conveniently pays the bill to financial institutions. However, Senez fails to teach or suggest features related to the relay server as recited in claim 16.

FIG. 1 of Senez depicts biller servers, financial institution servers, a bill processing

server, and a clearing house (which the Office asserts to be equivalent to "the relay server" of the

claims of the application). That is, Senez has the construction in which when the client selects

the bill payment icon (24) presented in the client computer (18) so as to send the HTML form to

the bill processing server (12), the bill processing server (12) debits the client's account by

contacting a selected one of the financial institution servers (16). The bill processing server

merely relays information between the client computer and the financial institution servers, and

thus the clearing house (11) only corresponds to a sub-server for facilitating debiting and

crediting activities. Neither the bill processing server nor the clearing house do not implement a

function of the relay server which processes payer information (or client information) provided

from financial institutions.

In the Office Action, the Examiner contends that "clearing house" (11 in FIG 1) of Senez

corresponds to the relay server of claim 16. In particular, the Examiner states that the processing

of payer information of the relay server is so broad that the limitation of claim 16 reads on the

clearing house because the clearing house processes information (Office Action at pages 3 and 4).

In order to expedite prosecution of the application, Applicant has amended claim 16 to

particularly point out the function of "a relay server." Applicant respectfully submits that the

features in the amended claim 16 are clearly distinguished from Senez's clearing house. With

regard to "clearing house," column 7, lines 51-56 of Senez describes as follows:

> Upon receipt of the client's confirmation message, the bill processing server 12 debits the
> client's account by contacting a selected one of the financial institution servers 16 and
> credits the biller's account by contacting a selected one of the financial institution servers

16. Alternately, bill processing server 12 transmits transaction information to clearing house 11 which facilitates the debiting and crediting activities. In either case, when the debit and credit activity is complete, both client computer 18 and biller servers 14 are notified by bill processing server 12 that the payment has been processed.

As described in the above cited portion, the clearing house simply performs debiting and crediting activities instead of the bill processing server. Senez does not disclose that the clearing house performs "the relay server receives information on payers who have completed a payment process and payment amounts paid by the payers, transmitted from a financial institution server and selects information including personal details of the payers, paid amounts and paid dates, which a payee wants to obtain, among the received information thereby to provide the processed payer information," as required in claim 16.

Furthermore, neither Ronen nor McNair teaches or suggests the step of receiving payer information from the financial institutions and processing of the relay server as required in amended claim 16.

Therefore, Applicant respectfully submits that claim 16 is patentable over Ronen in view of Senez and McNair.

With regard to claims 17 and 18, Applicant has amended the claims to further define "a relay server" and "a management server" considering the Examiner's statement about "the relay server" and "the management server" in the Office Action (pages 3 and 4). Thus, Applicant submits that the clearing house of Senez cannot correspond to the relay server and the management server of amended claims 17 and 18 because the clearing house merely performs

"debiting and crediting activities," but does not perform the functions of <u>the relay server</u> and <u>the management server</u> as recited in amended claims 17 and 18. Furthermore, Ronen and McNair do not make up for the deficiencies of Senez. Accordingly, Applicant respectfully submits that claims 17 and 18 are patentable over the references at least because the references, alone or in combination, do not teach or suggest all the claimed elements.

B.   Claims 19, 21, 23 and 24

Claims 19, 21, 23 and 24 are rejected under 35 U.S.C. 103 (a) as being unpatentable over Ronen in view of Senez and McNair and further in view of Antognini et al. (2002/0023055; hereinafter "Antognini"), Kitchen et al. (US 6,289,322; hereinafter "Kitchen"), or Budow et al. (US 5,661,517; hereinafter "Budow").

However, as discussed above, claims 16-18 on which claims 19, 21, 23 and 24 depend are patentable over Ronen in view of Senez and McNair. Further, the other references do not make up for the deficiencies of Ronen, Senez and McNair. Accordingly, Applicant submits that claims 19, 21, 23 and 24 are allowable over the references at least by virtue of their dependency on claim 16, 17 or 18.

III.   Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

      The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account.

                          Respectfully submitted,

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